

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ESTATE OF EITAM HENKIN, *et al.*

Plaintiffs,

-against-

KUVEYT TÜRK KATILIM BANKASI A.Ş.,

Defendant.

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No. 19-cv-05394-BMC

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Plaintiffs' Motion to Compel Defendant to Answer and Produce Documents Responsive to Plaintiffs' Initial Discovery, the Declaration of Kevin Attridge, both executed on May 19, 2025, together with the exhibits thereto and proposed order, and all prior pleadings and proceedings had here, Plaintiffs, by and through their undersigned counsel, will move this Court, before the Honorable Brian M. Cogan, U.S.D.J., at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time to be determined by the Court, for an Order pursuant to Fed. Rs. Civ. P. 26 and 34, to compel the production of the documents and information that Defendant has refused to produce based upon: (1) prohibitions imposed by Turkish bank secrecy laws; and (2) relevance, burden, and proportionality objections.

Dated: May 19, 2025

Respectfully Submitted,

/s/ Kevin L. Attridge

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